



**Linda S. Adams**  
Secretary for  
Environmental Protection

# California Regional Water Quality Control Board

## Santa Ana Region

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**Arnold Schwarzenegger**  
Governor

May 29, 2007

Jason Uhley, Senior Civil Engineer  
Riverside County Flood Control  
and Water Conservation District  
1995 Market Street  
Riverside, CA 92501

### **REVIEW OF 2007 REPORT OF WASTE DISCHARGE FOR THE RIVERSIDE COUNTY FLOOD CONTROL AND WATER CONSERVATION DISTRICT, THE COUNTY OF RIVERSIDE, AND THE INCORPORATED CITIES OF RIVERSIDE COUNTY, NPDES NO. CAS618033, AREAWIDE URBAN STORM WATER RUNOFF**

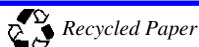
Dear Mr. Uhley:

We have reviewed the 2007 Report of Waste Discharge (ROWD) submitted on April 26, 2007 for renewal of Permit No. R8-2002-0011, NPDES NO.CAS618033. We evaluated the ROWD for administrative completeness in accordance with 40 CFR 122.26(d) and have found it incomplete.

The following information were not found in the ROWD:

1. Although the current co-permittees are anticipated to be the same co-permittees for the new permit, please provide individual letters of intent from each co-permittee to participate in the area-wide urban storm water runoff municipal separate storm sewer system ("MS4") NPDES permit for the Santa Ana River Watershed. Please identify any changes to the contact information for each permittee.
2. The RCFCD has been monitoring major outfalls in the permit area for a number of years, however, the pollutant loading data for all individual outfalls could not be found. Please provide an analysis of the annual pollutant load of the cumulative discharges to waters of the United States from all identified municipal outfalls and the event mean concentration of the cumulative discharges to waters of the United States from all identified municipal outfalls during a storm event (as described under 40CFR Sec. 122.21(g)(7)(ii) [reference corrected] for BOD5, COD, TSS, dissolved solids, total nitrogen, total ammonia plus organic nitrogen, total phosphorus, dissolved phosphorus, cadmium, copper, lead, and zinc. Please include procedures used for determining constituent loads and concentrations, including any modeling, data analysis, and calculation methods;

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3. For each major outfall identified in either 40 CFR 122.26 paragraph (d)(2)(ii) or (d)(1)(iii)(B)(1), please provide measured or estimated seasonal pollutant load and of the event mean concentration of a representative storm for any constituent detected in any sample required under paragraph (d)(2)(iii)(A) of 40 CFR 122.26;
4. Based on previous trends and future growth projections, please provide estimated reductions in loadings of pollutants from discharges of municipal storm sewer constituents from municipal storm sewer systems expected as the result of the municipal storm water quality management program (40 CFR 122.26.(d)(2)(v). The assessment shall also identify known impacts of storm water controls on ground water.
5. The maps of the MS4s within the permit area and stormwater program descriptions included in the ROWD for the most part fulfill the reapplication requirements. However, to promote implementability of various program elements, the following details need to be provided in the municipalities' local implementation plan (LIP):
  - a. Location of known municipal storm sewer system outfalls discharging to waters of the United States. Although the MS4 lines were shown in the areawide map submitted, all outfalls may not have been depicted or labeled. Given the extent of the permit area and considering that municipalities inspect, maintain and monitor illicit connection and illegal discharges, we would like to see a detailed map and inventory of the MS4s, including inlets, channels, basins, major infiltration devices and outfalls to receiving water in the municipalities' local implementation plan;
  - b. During the current permit term, the permittees evaluated their existing MS4s to evaluate opportunities to configure or re-configure channel segments to function as pollution control devices and to optimize beneficial uses. As new or retrofit projects are proposed, we would like this effort to continue as an ongoing part of the permittees' effort to implement watershed protection principles. Please provide a description of procedures to assure that flood management projects assess the impacts on the water quality of receiving water bodies and evaluate such opportunities to configure channel segments and in in-line or offline channel basins, etc. ;
  - c. The location of each currently operating or closed municipal landfill or other treatment, storage or disposal facility for municipal waste were depicted in a map submitted with the ROWD. Since municipal waste handling is part of the municipalities' activities, we would like to see a description of waste handling practices in the municipalities' local implementation plan;
  - d. The identification of publicly owned parks, recreational areas, and other open lands.



- e. Areawide templates have been developed to address pollution prevention measures from municipal activities. A description of practices for operating and maintaining public streets, roads and highways and procedures for reducing the impact on receiving waters of discharges from municipal storm sewer systems should be incorporated in the local implementation plan.
- f. A description of structural and source control measures to reduce pollutants from runoff from commercial and residential areas that are discharged from the municipal storm sewer system that are to be implemented during the life of the permit, accompanied with an estimate of the expected reduction of pollutant loads and a proposed schedule for implementing such controls. At a minimum, the description shall include a description of maintenance activities and a maintenance schedule for structural controls to reduce pollutants (including floatables) in discharges from municipal separate storm sewers (40 CFR 122.26(d)(2)(A(1)). This information can be provided in the municipalities' local implementation plan.
- g. Section VIII.9 of the current permit requires that the permittees ensure that watershed protection principles and policies are properly considered and are incorporated into the land use approval processes. Please provide a description in the local implementation plan of how these principles have been translated into implementation processes and documents including approved development standards, zoning ordinances, standard conditions of approval, or project development guidelines, etc.;
- h. Some development projects are approved with artificial lakes that are being maintained by private entities. We believe that these lakes, although generally installed for aesthetic reasons, provide some water quality benefits if adequately maintained. However, in some cases, these private lakes receive urban runoff upstream of the watershed, and although initially approved to contain 100 year storm, these lakes discharge to public MS4s more frequently than 100 year events. Please provide a description of procedures for review, approval and assurance of adequate long term maintenance of such lakes to ensure that they do not cause or contribute to exceedances of water quality standards.
- i. Please include in the LIP, a list of water bodies that receive discharges from the municipal separate storm sewer system, including downstream segments, lakes and estuaries, where pollutants from the system discharges may accumulate and cause water degradation and a brief description of known water quality impacts. At a minimum, the description of impacts shall include a description of whether the water bodies receiving such discharges are:
  - Listed as an impaired water body under Clean Water Act (CWA) 303(d).
  - Identified with water quality standards in the Basin Plan;



- Recognized by the applicant as highly valued or sensitive waters;
- Defined by the State or U.S. Fish and Wildlife Service's National Wetlands Inventory as wetlands; and
- Found to have pollutants in bottom sediments, fish tissue or bio-survey data.

Please provide to us by **June 30, 2007**, the above information or reference the specific page number and section of the ROWD where the specific information referenced above is provided in the ROWD.

If you have any questions, please contact Mr. Keith L. Elliott at (951) 782-4925.

Sincerely,

Milasol C. Gaslan, Chief  
Inland Storm Water Unit

Cc/ via e-mail:        See Riverside County MS4 Permit Interested Parties List

